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INTRODUCTION

The Local Development Plan process is new and Bridgend Town Council (BTC), although it has sought advice as to the hearing procedure and attended the pre hearing (notes of the pre hearing have been provided), it wishes to present the following observations to clarify its previous submissions which also reflect the concerns of local people. This submission relates to Retailing. The following observations follow the Inspector's 'Agenda with Matters and Issues' format using the Inspector's paragraph numbering and headings.

4 BREWERY FIELD, BRIDGEND

BTC Background

BTC is very much aware through its involvement with the Bridgend County Borough Council (BCBC), Town Traders and reports concerning retail needs by CACI, and The Portas Review "An independent review into the future of our high streets" and regular reports to the Town Council itself from its own members.

BTC has also considered the content of the LDP in terms of 'Social Care' and the LDP starts at Chapter 1, page 1 with the statement;

1.1.3 The LDP is one of four key strategies that Local Authorities in Wales have to prepare. The other three are:

- *The Community Strategy*
- *The Children and Young People's Plan*
- *The Health, Social Care and Wellbeing Strategy*

1.1.4 The LDP is a key means of delivering the land use elements of these and other strategies.

The Town Council has, in submitting AS005 brought the issues summarised above together, but especially, in its opinion, that the needs of the elderly in terms of future care has not been fully covered by policy or allocation within the LDP.

References - Social Care (LDP)

The LDP references to 'sheltered housing' and or 'extra care' are as follows;

Chapter1, Page 4

LS 11 *There is a shortfall in the provision of extra care housing and of smaller dwellings and in particular two bedroom properties, in both the affordable and general purpose housing markets across the County Borough.* [BTC underlining]

Appendix 1, Page 99

A1.15 PLA3(15) Glanyrafon, Tondu A1.15.1

The Glanyrafon site, located immediately opposite the Gateway of the Valleys new comprehensive school, provides the opportunity for housing renewal in the form of extra care housing and an enhanced special Health and wellbeing facility. The project is being taken forward on a partnership basis by the Council, the local Health Board (ABM) and a proposed future registered social landlord.

References - The Community Strategy

This is a document that covers many community issues, however, it does not express a great deal when it comes to topics such as extra care sheltered accommodation so does not really contribute to the LDP process. The exception is in Appendix 1 – Action Plan where it does states;

Investigate	Review practices of engagement and participation of older people across Wales and develop recommendations for Bridgend County Borough	Develop a framework for engagement which will result in a more active engagement and participation from older people A regular meeting of voluntary and community sector organisations directly influencing the and helping us to improve services for older people Older people will be empowered to interface with directly with service areas developed of the partnership as a whole.
	Develop voluntary sector network to better inform and involve the third sector	
	Develop a series of engagement and participation seminars to enable older people to voice opinions on specific issues pertaining to older people.	

Reference - Health, Social Care & Wellbeing Strategy for Bridgend County Borough 2011 – 2014

This document although it covers a very wide range of matters including background, strategic context, local need, outcome based accountability, and action planning and the specific reference to extra care follows it does not provide sufficient context that would cover need for the plan period.

Outcomes Based Accountability

Summary of what we know works

There is local evidence that establishing new services that promote independence and reconfiguring existing services improves the outcome for service users and reduces demands on existing statutory services. Specific examples include:

- *Integrated health and social care intermediate services that prevent hospital admission, supports discharge e.g. CIIS*
- *Services that support a sense of security and wellbeing on a 24 hour basis, e. g. BridgeLink Telecare*
- *Integrated health and social care rehabilitation services e.g. Community Disability Rehabilitation Team*
- *An enabling home care service that reduces the individual's need for on going home care e.g. BridgeStart Home Care*
- *Services that provide support for carers and enable them to continue to care for as long as possible e.g. Crossroads respite service, BridgeLink Telecare, Carers Emergency Support Card*
- *Developing models of accommodation that support independence e.g. Extra Care [BTC underlining]*
- *Improving the demonstration of and access to community equipment e.g. Integrated Community Equipment Service*

BTC brings together the references above and concludes that its submission to allocated the Brewery Field for 'sheltered housing – extra care' could be part of a new approach to regeneration of Bridgend Town by its contribution through a 'community allocation'. As Mary Portas states in her review;

"I want to breathe economic and community life back into our high streets

The new high streets won't just be about selling goods. The mix will include shops but could also include housing, offices, sport, schools or other social, commercial and cultural enterprises and meeting places. They should become places where we go to engage with other people in our communities, where shopping is just one small part of a rich mix of activities."

BTC has not taken the term 'high street' literally and uses the Portas Review in general terms to signpost a pathway to town centre improvement.

BTC also realises that the whole area of Brewery Fields may not be required to provide the output of an 'extra care' facility in that circumstance the Town Council argues that the allocation takes that into account.

Census 2001

CENSUS 2001: Population: Age

Description	England and Wales	Bridgend
Under 16	20.2	20.4
16 to 19	4.9	4.6
20 to 29	12.6	11.2
30 to 59	41.5	41.9
60 to 74	13.3	14.2
75 and over	7.6	7.7
Average age	38.6	39.3

Community Strategy Page 9

Strong Communities

We know that

- Similar to other areas in Wales, people over the age of 50 make up over 35% of our population. Nationally people over 65 make up 16% of the population but account for nearly 50% of health and social care expenditure.
- Older people, because of personal and external circumstance, often feel alone and isolated in their communities.
- We live in a society where our economy is increasingly reliant upon older people with the abolition of the retirement age, lowered birth rates and fewer young people entering the workforce. [BTC underlining]

The Census table does not show age 65 and over but the last two bands are significant enough showing that approximately 22% of the population are in a category that identifies a 'significant base' for future potential 'extra care' consideration especially the band 75 and above.

Conclusion

The issue of need is recognised as the above extracts from BCBC strategies show e.g. – the statistics, the need for modelling and to a small degree the LDP statement about Glanyrafon; however, the LDP does not have any explicit strategy regarding this area of need for the plan period other than the above extracts.

**Qn6e. Has the Town Council’s proposed alternative residential development been subject to sustainability appraisal?
Sustainability Report refer APPENDIX A**

BTC completed a Sustainability Appraisal for AS005 which is located in the Alternative Sites Register, Representations and Council’s Response. In this submission BTC has provided at APPENDIX A – Sustainability Appraisal (BCBC and BTC). below which shows the assessment of the allocation for Bulky comparison Goods and Sheltered Housing side by side.

In the circumstance BTC believes that the AS005 as a proposed allocation is not unreasonable, the extent of the land area is debateable, however, the allocation can be amended to provide an allocation that incorporates the Council’s allocation and that of AS005.

APPENDIX A – Sustainability Appraisal (BCBC and BTC).

Policy Number REG11(4)					
Policy Name		Brewery Field, Bridgend			
Site Area (Ha)	2.67	Site Use	Bulky comparison Goods		Sheltered Housing
Objective	Assessment	BCBC Commentary	Assessment	BTC Commentary	
To ensure an increase in accessibility to opportunities, transport and to all services and information in the County Borough.	●	The site lies immediately adjacent to Bridgend Town Centre and therefore is highly accessible by pedestrians, cyclists, bus and train travellers as well as the car.	●	The site is within easy, flat walking distance of town amenities for elderly and disabled people.	
To provide the opportunity for people to meet their housing needs	?	Dependant on the final schemes design, there may be scope for residential development above the ground floors of this site.	●	The site would be suited to provide sheltered accommodation in the form of extra care units, in line with the current policy aim of prolonging independent living for elderly people. Also meets policies SP2 and COM4	
To improve overall levels of health and safety, including the sense of security, for all in the County Borough	-	The proposal would result in the loss of the Brewery Field and so it would need to be demonstrated that this facility is not lost to the people of Bridgend. No identifiable relationship between the allocation and the sustainability	●	Intermediate care facilities at extra care development can reduce the length of hospital stays for elderly people and in some cases remove the need for admission altogether, thus freeing up hospital beds.	
To maintain, promote and where suitable enhance, the distinctive character of the communities of Bridgend	-	No identifiable relationship between the allocation and the sustainability concern. No identifiable relationship between the allocation and the sustainability	-		
To maintain and enhance the diversity and abundance of species, and safeguard areas of significant nature conservation value	-	No identifiable relationship between the allocation and the sustainability concern.	-		
To maintain and enhance the quality and character of the landscape, including its contribution to the setting and character of settlements	-	No identifiable relationship between the allocation and the sustainability concern.	-		
To maintain and enhance the quality of the built environment, including the cultural/historic heritage	-	The site is within the urban area, and is unlikely to impact on the landscape. Design policies in the plan will ensure the development's assimilation into the surrounding urban setting.	-		
To reduce all forms of air pollution in the interests of local air quality and the integrity of the atmosphere	●	Being located next to the town centre this development proposal is highly accessible by means other than the car. Increasing the attractiveness of Bridgend Town centre could also reduce the need to travel to other centres in the region.	●	Being located next to the town centre this sheltered housing complex would be highly accessible to visitors by means other than car.	

Policy Number REG11(4)				
Policy Name		Brewery Field, Bridgend		
Site Area (Ha)	2.67	Site Use Bulky comparison Goods	Sheltered Housing	
Objective	Assess ment	BCBC Commentary	Assess ment	BTC Commentary
To ensure that new development takes into account the effects of climate change	?		<input checked="" type="checkbox"/>	Site within a protected floodplain
To maintain and improve the quality and quantity of ground waters, river waters and coastal and bathing waters	-	No identifiable relationship between the allocation and the sustainability concern, This site would redevelop an existing site.	<input type="checkbox"/>	
To use land efficiently, retaining undeveloped land and bringing damaged land back into use	●	This site would redevelop an existing site. There is potential to reuse material on site,	●	This site would redevelop an existing site
To maintain the stock of minerals and non-renewable primary resources	●/ ?	There is potential to reuse material on site, The site is over 1,000 m2 and therefore under the policies in the LDP will need to investigate sources of renewable energy.	-	
To increase the opportunities for energy generation from renewable energy sources	●/ ?		-	
To ensure that there is a vibrant local economy which is at the forefront of a wider regional economy and provide diversity of employment within the County Borough and support a culture of entrepreneurship,	●	The development of this site will create jobs in the service / commercial / leisure sectors.	-	
To achieve a clear connection between effort and benefit, by making the most of local strengths, seeking community regeneration, and fostering economic activity	●	Job creating potential and town centre vibrancy will support community regeneration and economic activity.	-	
Conclusions		This site, just outside the town centre, is one of a number in Bridgend Town Centre which seeks to boost the retail /commercial offer of the area. This brownfield site in the urban area is highly accessible and will generate new jobs in the service sector and support vibrant town centres.		Extra Care Housing gives elderly people independence and choice and enables them to remain in their own home for the remainder their life, regardless of changes in their care needs. This site is a short, flat walk into town to allow less mobile people to access vital services and make full use of amenities. Its proximity to bus and rail stations gives plenty of non-car travel options for resident and visitors alike.